



INTERNATIONAL ASSOCIATION OF FIRE CHIEFS

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January 21, 2015

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington D.C. 20554

Re: PS Docket No. 07-114, Wireless Location Accuracy Requirements

Dear Ms. Dortch:

On January 20, representatives of the International Association of Fire Chiefs (IAFC) participated in a meeting with staff of the Federal Communications Commission's (FCC) Public Safety and Homeland Security Bureau. Participating in the meeting on behalf of the Bureau were Rear Admiral David Simpson, USN (ret), Chief of the Bureau, and David Furth, Deputy Bureau Chief. Participating in the meeting on behalf of the IAFC were Chief Gary McCarraher, Fire Chief of the Franklin, Massachusetts, Fire Department and IAFC Communications Committee Chair (by phone); Ken LaSala, Director of Government Relations and Policy; and Jim Goldstein, Government Relations and Policy Manager. The IAFC represents more than 11,000 leaders of the nation's fire and emergency service.

The IAFC commended the FCC for its focus on improving the location information being provided to first responders from wireless devices during 9-1-1 calls. More accurate location information allows our members to provide lifesaving assistance in the most time-effective manner. At the meeting, we reiterated some key principles from our reply comments filed on December 24 that we believe that the FCC should consider from a public safety standpoint prior to issuing its final regulations. We discussed our support for the concept of "dispatchable location" as it is identified in the Roadmap agreement that was developed by the National Emergency Number Association, the Association of Public-Safety Communications Officials-International, and the carriers. We also reiterated our support for inclusion of portions of the Roadmap into the final FCC rules so long as they provide achievable performance objectives that ensure the accurate transmittal of the horizontal and vertical location of an indoor 9-1-1 caller.

During the discussion, we also stated that the test bed should not be evaluated solely by the signatories of the Roadmap, but that the FCC should have oversight of the process. Any technologies tested by the roadmap must be judged using objective performance criteria. We recommend that the performance criteria should be the ability to provide an accurate dispatchable location or within 50 meters on the x- and y-axis and within 3 meters on the z-axis. Only the technologies that pass the test bed should be used as technology solutions for providing the location information of a wireless indoor 9-1-1 caller. We emphasized in particular how important the technology providing z-axis information is to the fire service, not only for finding the general public, but potentially also being able to use this technology to locate firefighters in the future as the technology becomes more robust.

We also raised our concerns about administration of the proposed National Emergency Address Database (NEAD). The NEAD is important to the success of the concept of dispatchable location, yet the governance and funding of the NEAD is unresolved. We discussed the issues of security and privacy of the database and how these issues need to be resolved since the NEAD is a critical component of the success of the Roadmap.

If location technologies pass the test bed, the IAFC believes that the carriers should be able to determine which technologies to use to provide an accurate indoor location. The Roadmap discusses using test regions to include dense urban, urban, suburban, and rural morphologies, which will be distributed across the country and cover various buildings. We support this concept. If Wi-Fi, Bluetooth and similar small-cell technologies pass the test bed, the FCC still must hold the carriers responsible to use other technologies that have met the performance criteria in their networks and mobile phones in areas where these small-cell technologies not widely available. In addition, we discussed the IAFC's view that the FCC must ensure that the carriers bear the ultimate responsibility for ensuring accurate indoor location technology across the country.

The IAFC has supported the FCC's proposed regulations to date. At the same time, we support the FCC incorporating portions of the Roadmap into its final rules, as long as these provisions are measureable, have achievable benchmarks, and are enforceable by the FCC. Enforceability by the FCC is a key element to ensure that the carriers provide improved indoor location results in a reasonable timeframe. We also believe that the FCC's final rules must ensure that the carriers utilize the best technology to provide this accurate indoor location information, and not rule out any form of technology due to any potential costs. In addition, the FCC's final rules must include a reasonable and transparent set of milestones for timely implementation. The carriers must bear the ultimate responsibility for ensuring accurate indoor location technology across the country.

The IAFC appreciates the FCC's focus on improving the 9-1-1 location information that first responders receive. As you know, every minute counts in an emergency response situation. As the FCC continues to consider this issue, we look forward to working with you to develop regulations that will protect the lives of the American public.

Sincerely,

A handwritten signature in black ink, reading "Kenneth P. LaSala, Jr." with a stylized flourish at the end.

Kenneth P. LaSala, Jr.
Director of Government Relations and Policy